

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In Re:

SUE ANN ONDERSMA

Case No. 20-00980-swd
Chapter 13
Hon. Scott W. Dales

Debtor(s)

**LAKE TRUST CREDIT UNION'S RESPONSE TO
APPLICATION FOR ADDITIONAL ATTORNEY FEES
AND/OR RECOVERY OF COSTS ADVANCED**

Creditor, LAKE TRUST CREDIT UNION, through its counsel, BUTLER ROWSE-OBERLE PLLC, for its response to the Application for Additional Attorney Fees and/or Recovery of Costs Advanced states as follows:

1. Creditor does not object to the amount of fees requested or the work performed.
2. Creditor does object the disbursement of the fees awarded from the funds which first become available.
3. Creditor is the holder of a secured auto claim: 2014 Ford Escape.
4. Payments on Creditor's claims are disbursed by the Chapter 13 Trustee.
5. Debtor's Chapter 13 Plan payments are \$145.00 bi-weekly.
6. Counsel's current fee request totals \$994.23.
7. Disbursement of fees in the manner requested will render Creditor's claim further delinquent as there are insufficient funds to satisfy the payment of the fees requested and to maintain ongoing disbursements to Creditor.

WHEREFORE, Creditor requests the Court enter an Order Approving Fees with Debtor's counsel's fees to be paid at the rate of \$132.75 per month.

September 14, 2021

BUTLER ROWSE-OBERLE PLLC

/s/Karen L. Rowse-Oberle

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2021, I electronically filed Lake Trust Credit Union's Response to Application for Additional Attorney Fees and/or Recovery of Costs Advanced foregoing Paper(s) with Clerk of the Court using the ECF system which will send notification of such filing to the following:

- **Jeffrey D. Mapes, Attorney for Debtor**
- **Brett N. Rodgers, Chapter 13 Trustee**

BUTLER ROWSE-OBERLE PLLC

/s/ Bridgette Dockery
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